



Financial Crimes Enforcement Network
U.S. Department of the Treasury

Washington, D.C. 20220

IMPORTANT NOTICE TO BATCH XML AND DISCRETE BSA E-FILERS:
FinCEN to Update the XML Batch and Discrete Entry Validation Rules to Prohibit Specific Characters/Formatting – Deadline Extended to April 30th, 2019

September 28th, 2018 – Beginning on April 30th, 2019, FinCEN will implement a new data validation rule that prohibits the acceptance of the following characters/formatting:

- Leading/Trailing Spaces
- Carriage Returns
- Line Feeds
- Horizontal Tabs

All discrete entry form submissions, as well as all XML batch submissions, must be free of the above characters/formatting by this deadline; otherwise, the submission will be REJECTED by FinCEN.

NOTE: On July 31, 2018, FinCEN posted a notice on the BSA E-Filing System website stating that the above data validation rule would be implemented on October 1st, 2018, for all form types; however, FinCEN has elected to delay the above data validation rule until April 30th, 2019.

XML BATCH FILER IMPACT

- FinCEN SAR XML batch filers (deployed to the BSA E-Filing System production environment on July 27, 2018) already has implemented the above data validation rule (with the exception of the narrative portion of the report), resulting in a batch rejection if the validation fails.
- FinCEN CTR XML and FinCEN FBAR XML batch filers will have until April 30th, 2019, to achieve compliance, at which time the batch submission will be rejected if the validation fails.

DISCRETE FILER IMPACT

- On April 30th, 2019, ALL discrete entry form types must be free of the above special characters/formatting prior to submission; otherwise, the submission will be rejected by the application.
- Previously downloaded discrete entry forms will continue to be accepted beyond April 30th, 2019 as long as they are free of the above special characters/formatting.
- New discrete entry forms downloaded from the site contain built-in validation edits that remove the above special characters/formatting from all fields (with the exception of the FinCEN SAR narrative as this field allows the entry of special characters).

In an effort to assist XML batch filers with testing the above validation changes, FinCEN has posted updated XML schemas and associated User Guides for the FinCEN CTR and FinCEN FBAR batch form types.

- Schema (xsd)
 - https://www.fincen.gov/sites/default/files/schema/base/EFL_CTRXBatchSchema.xsd
 - https://www.fincen.gov/sites/default/files/schema/base/EFL_FBARXBatchSchema.xsd
- User Guide (pdf)
 - https://bsaefiling.fincen.treas.gov/docs/XMLUserGuide_FinCENCTR.pdf
 - https://bsaefiling.fincen.treas.gov/docs/XMLUserGuide_FinCENFBAR.pdf

These new schemas includes a pattern restriction that produce a schema validation failure for the above unwanted characters/formatting. REMINDER: The latest FinCEN SAR XML schema (https://www.fincen.gov/sites/default/files/schema/base/EFL_SARXBatchSchema.xsd) as well as the User Guide (https://bsaefiling.fincen.treas.gov/docs/XMLUserGuide_FinCENSAR.pdf) already includes the pattern restrictions. The following is an example of the new pattern restriction within the schema:

```
<xsd:simpleType name="RestrictString50">
  <xsd:restriction base="xsd:string">
    <xsd:maxLength value="50"/>
    <xsd:pattern value="\S+( +\S+)*|"/>
  </xsd:restriction>
</xsd:simpleType>
```

Here are a few examples of input batch data that would fail schema validation related to the above pattern restriction:

Leading & Trailing Spaces:

```
<fc2:PartyName SeqNum="35">
  <fc2:PartyNameTypeCode>L</fc2:PartyNameTypeCode>
  <fc2:RawEntityIndividualLastName> Johnson</fc2:RawEntityIndividualLastName>
  <fc2:RawIndividualFirstName>Joe</fc2:RawIndividualFirstName>
</fc2:PartyName>
```

*Carriage Returns()/Line Feeds(
)/Horizontal Tabs():*

```
<fc2:PartyName SeqNum="35">
  <fc2:PartyNameTypeCode>L</fc2:PartyNameTypeCode>
  <fc2:RawEntityIndividualLastName>Johnson
</fc2:RawEntityIndividualLastName>
  <fc2:RawIndividualFirstName>Joe&#10;</fc2:RawIndividualFirstName>
</fc2:PartyName>
```

Please be advised that not all elements in the schema have this new pattern restriction due to XML limitations; however, filers must ensure that ALL elements for these form types do not include the unwanted characters/formatting in the XML batch file.

Filers are encouraged to register on the [BSA E-Filing User Test System](#) to preview and test the above format validation changes.

For any questions please contact the BSA E-Filing Help Desk at 1-866-346-9478 or via email at BSAEFilingHelp@fincen.gov. The Help Desk is available Monday through Friday from 8 a.m. to 6 p.m. EST. Please note that the Help Desk is closed on Federal holidays.